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January 22, 2008

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Hon. Colleen McMahon
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 640
New York, New York 10007-1312

MEMO ENDORSED

Re: **TANG KHEOK HWA ROSEMARY d/b/a R M MARTIN SUPPLIES AND SERVICES v. JALDHI OVERSEAS PTE LTD.**
Docket Number: 07 Civ. 7498 (CM)
LML Reference Number: 1208

Dear Judge McMahon,

We represent the Plaintiff, Tang Kheok Hwa Rosemary d/b/a R M Martin Supplies and Services, in the above captioned matter. We write in response to Defendant's request for an Order directing Plaintiff to post counter-security in ten days.

As set forth in our opposition papers, Plaintiff is a small company with few assets. Thus, it is currently working to see how counter-security can be provided in the given circumstances. In light of the foregoing, we respectfully request that the Court refrain from ordering Plaintiff to post counter-security for three weeks while it is exploring ways to provide counter-security.

We understand that at the conclusion of three weeks, the Court may, in its discretion, endorse Defendant's proposed Order. While we cannot at this time guarantee that the Plaintiff will be able to post-security at the conclusion of the three weeks, we submit that it would only be equitable to allow Plaintiff, as a small company, a reasonable amount of time to post-counter-security.

Thus, we respectfully request that the Court refrain from endorsing Defendant's proposed Order for three weeks.

We are available to discuss the matter raised herein at your Honor's convenience.

Respectfully Submitted,

Nancy R. Siegel
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